

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re:

AMFIN FINANCIAL CORPORATION, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 09-21323  
) (Jointly Administered)  
)  
) Judge Pat Morgenstern-Clarren  
)  
)

**NOTICE OF MOTION OF THE DEBTORS FOR AN ORDER (A) APPROVING  
PROPOSED SALE PROCEDURES, (B) AUTHORIZING AMFIN REAL ESTATE  
INVESTMENTS, INC. TO SELL CERTAIN ASSETS TO HARBOR GROUP  
INTERNATIONAL, LLC FREE AND CLEAR OF LIENS, CLAIMS, AND  
ENCUMBRANCES, (C) APPROVING THE EMPLOYMENT OF HILCO REAL  
ESTATE LLC, PURSUANT TO 11 U.S.C. § 327 (D) WAIVING THE BANKRUPTCY  
RULE 6004(H) 14-DAY STAY, AND (E) WAIVING THE LOCAL BANKRUPTCY RULE  
9013-2 MEMORANDUM REQUIREMENT**

The above-captioned debtors (collectively, the “Debtors”), have filed the Motion of the Debtors for an Order (A) Approving Proposed Sale Procedures, (B) Authorizing Amfin Real Estate Investments, Inc. To Sell Certain Assets To Harbor Group International, LLC Free And Clear Of Liens, Claims, And Encumbrances, (C) Approving The Employment Of Hilco Real Estate LLC, Pursuant To 11 U.S.C. § 327 (D) Waiving The Bankruptcy Rule 6004(H) 14-Day Stay, And (E) Waiving The Local Bankruptcy Rule 9013-2 Memorandum Requirement.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the Application or if you want the court to consider your views on the Application, then on or before April 12, 2011, you or your attorney must:

File a written response explaining your position at:

Clerk of Bankruptcy Court

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<sup>1</sup> The Debtors are: AmTrust Financial Corporation nka AmFin Financial Corporation (Case No. 09-21323), AmTrust Real Estate Investments, Inc. nka AmFin Real Estate Investments, Inc., (Case No. 09-21328), AmTrust Insurance Agency, Inc. nka AmFin Insurance Agency, Inc. (Case No. 09-09-21325), AmTrust Investments Inc. nka AmFin Investments Inc. (Case No. 09-21331), AmTrust Properties Inc. nka AmFin Properties Inc. (Case No. 09-21329) and AmTrust Management Inc. nka AmFin Management Inc. (Case No. 09-21332).

United States Bankruptcy Court  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue  
Cleveland, Ohio 44114

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Glenn E. Morrical  
Thomas W. Coffey, Esq.  
Tucker Ellis & West LLP  
1150 Huntington Building  
925 Euclid Avenue  
Cleveland, Ohio 44115-1414  
Counsel for AmTrust Financial Corp.  
Debtor and Debtor-In-Possessions

If no response is received by April 12, 2011, the Court may enter an order granting the Application without actually holding a hearing. If an objection is timely filed, then a hearing is scheduled for **April 21, 2011 at 10:30 a.m.** in United States Bankruptcy Court, Howard M. Metzenbaum U.S. Courthouse, 201 Superior Avenue, #2A, Judge Morgenstern-Clarren Courtroom, Cleveland, Ohio 44114.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief without further notice or holding an actual hearing.

Respectfully submitted,  
TUCKER ELLIS & WEST LLP

/s/ Thomas W. Coffey  
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SPECIAL COUNSEL FOR DEBTORS